

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**In Re: BENJAMIN ERIC WATTS and  
AMY NICOLE WATTS**

**CHAPTER 13  
NO. 14-14565 JDW**

**MOTION REQUESTING REDUCTION IN TIME**

COMES NOW, Debtors, BENJAMIN ERIC WATTS and AMY NICOLE WATTS, by and through undersigned counsel and moves this Court for an Order allowing a reduction of time in which to notice creditors on the Motion for Authority to Sell Property of the Estate (Dkt. #87) (“Motion to Sell”) Debtors request that the notice period for the Motion to Sell be reduced from twenty-one (21) days to ten (10) days, respectfully showing unto the Court as follows:

1. An original Motion for Approval of the sale of Debtors' land and mobile home was filed, but an Order was not entered due to confusion as to what was needed from undersigned counsel, who took over the case after the first Motion to Sell was filed and the submission of a proposed order.

2. Subsequently, a proposed Agreed Order authorizing the sale was submitted by undersigned counsel to the attorney for the Chapter 13 Trustee, who requested that the schedules be amended to establish that Debtors are entitled to retain the proceeds of the sale as an exempt asset, and that a new Motion needs to be filed.

3. The purchaser buying the property is doing so to provide a residence for a family member who has recently given birth to a child; thus, time is of the essence for the purchaser.

4. Since all creditors received notice once already on a similar Motion to approve the sale, 10 days should be ample time to review the Motion and file an appropriate response, if needed.

WHEREFORE, Debtors pray that this Court enter its Order granting a reduction of time in which to notice creditors on the Motion for Authority to Sell Property of the Estate (Dkt. #87) from twenty-one (21) days to ten (10) days. Debtors pray for such other, further and general relief to which they may be entitled.

Respectfully Submitted,  
BENJAMIN ERIC WATTS and  
AMY NICOLE WATTS, Debtors

By: /s/Robert Gambrell  
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CERTIFICATE OF SERVICE

I, ROBERT GAMBRELL, Attorney for the above listed Debtors, do hereby certify that the following have been served electronically via ECF with a copy of the above Motion to Requesting Reduction in Time to:

David W. Asbach, Acting U. S. Trustee  
Locke D. Barkley, Chapter 13 Trustee  
and to all parties that have entered an appearance requesting service via ECF

This the 25<sup>th</sup> day of March, 2019.

/s/ Robert Gambrell  
ROBERT GAMBRELL